

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

-----In the Matter of-----

PUBLIC UTILITIES COMMISSION

Instituting a Proceeding to Investigate
Proposed Amendments To the
Framework for Integrated Resource
Planning.

Docket No. 2009-0108

PUBLIC UTILITIES
COMMISSION

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KAUAI ISLAND UTILITY COOPERATIVE'S
SUBMISSION OF INFORMATION REQUESTS

AND

CERTIFICATE OF SERVICE

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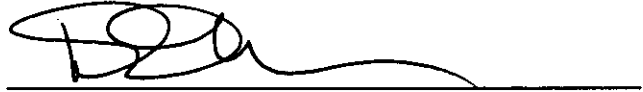
KAUAI ISLAND UTILITY COOPERATIVE'S
SUBMISSION OF INFORMATION REQUESTS

KAUAI ISLAND UTILITY COOPERATIVE ("KIUC"), by and through its attorneys,
Moriwara Lau & Fong LLP, hereby submits its Information Requests on Preliminary
Statements of Position ("SOPs") filed in this docket, pursuant to the Stipulated
Procedural Order, filed on September 11, 2009, as amended.¹ These information
requests are being issued to the following:

1. Hawaiian Electric Company, Inc. Hawaii Electric Light Company, Inc., and
Maui Electric Company, Limited,
2. The Department of Business, Economic Development, and Tourism,
3. The Counties of Hawaii, Kauai, and Maui, and
4. The Division of Consumer Advocacy.

¹ See Order Approving the Stipulated Procedural Order, as Modified, dated September 23, 2009, which amends the schedule of proceedings proposed by the parties on July 29, 2009 by, among other things, establishing a new deadline for the submission of the Information Requests on Preliminary SOPs to November 10, 2009.

DATED: Honolulu, Hawaii, November 10, 2009.

A handwritten signature in black ink, appearing to read 'Kent D. Morihara', is positioned above a horizontal line.

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DOCKET NO. 2009-0108

KAUAI ISLAND UTILITY COOPERATIVE'S ("KIUC")

SUBMISSION OF INFORMATION REQUESTS

The following information request is directed to HAWAIIAN ELECTRIC COMPANY, INC. ("HECO"), MAUI ELECTRIC COMPANY, LIMITED ("MECO"), AND HAWAII ELECTRIC LIGHT COMPANY, INC. ("HELCO") (collectively, "HECO Companies") and is based on their joint Preliminary Statement of Position ("SOP"):

KIUC-PSOP-IR-1 Ref: HECO Companies' Preliminary SOP, Pages 24-27.

In its Preliminary SOP, the HECO Companies states, in relevant part:

The Hawaiian Electric Companies are also adding two new planning initiatives to the Proposed CESP Framework: Renewable Energy Zones ("REZ") and Locational Value Maps ("LVM"). The REZ is proposed to identify areas that contain significant renewable energy resource potential and *identify the possible transmission infrastructure required to integrate the renewable energy resources in the REZ.*

....

The Locational Value planning process developed as part of the California IAP has helped to shape the development of "the lowest hanging fruit" for California utilities to tap in-state resources and local generating resources that alleviate pockets of distribution and sub-transmission congestion. This Locational Value approach has also been adopted by states like New York with limited land for developing large renewable resources (vs. a REZ). Thus, the LVM planning concept provides a more detailed level of planning that integrates large REZ but also enable [sic] the maximization and siting of distributed resources via AML, DSM and future smart grid community programs onto the grid.

- a. Please provide a more detailed description of the Locational Value planning process developed as part of the California IAP, together with any documentation that could provide a further understanding of the process developed in California.

- b. Please provide a more detailed description of the Locational Value approach adopted in New York, together with any documentation that could provide a further understanding of the process developed in New York.
- c. Please describe how the Locational Value approach adopted in New York differs, if at all, from the process developed as part of the California IAP.
- d. How do the HECO Companies plan to utilize the California and New York plans and processes to make it specific to and apply to the State of Hawaii and/or each particular island?
- e. Please provide a copy of an LVM that the HECO Companies have or would plan to use as a format in developing their LVM.
- f. Please explain what process the HECO Companies would plan to follow within the context of a CESP framework for revising or updating its REZ and LVM designations from time to time.
- g. Should the CESP Framework be made broad enough to allow for the discontinuance or non-applicability of REZs or LVMs for a particular island or islands? Please explain why or why not.

The following information requests are directed specifically to the COUNTY OF KAUAI and are based on the joint Preliminary Statement of Position ("SOP") submitted by the Counties of Hawaii, Kauai, and Maui (collectively "Counties"):

KIUC-PSOP-IR-2 Re: Counties Preliminary SOP, page 9.

In their Preliminary SOP, the Counties state, in relevant part, that Governing Principle #6 of the current IRP Framework be expanded to

require that “[e]ach utility shall model at least five resource portfolios/scenarios proposed by each utility’s Advisory Group.”

Please provide a detailed explanation as to the reasoning behind the Counties’ recommendation to **require** at least five resource portfolios/scenarios from each Advisory Group, including but not limited to explanations as to why the minimum number of five portfolios/scenarios was selected. For example, based on KIUC's prior experience with advisory groups, KIUC has found that prior advisory groups tend to prefer responding to proposals made by the utility as opposed to proactively proposing initiatives on their own. Given that, does the County of Kauai believe that this requirement should be applicable to KIUC's planning process? Please explain.

KIUC-PSOP-IR-3 Re: Counties Preliminary SOP, page 13.

In their Preliminary SOP, the Counties state, in relevant part, that they believe that their Preliminary Statement of Position is relevant to both electric cooperatives and investor owned utilities and that they “are open to reviewing specific recommendations and discussions from” KIUC. Does the County of Kauai believe that the ownership differences between KIUC and an investor-owned utility should be considered in establishing this framework? If so, should this be done through KIUC establishing its own framework, through the waiver/exemption process contained in the HECO Companies’ proposed CESP process, through a separate section

or sections for electric cooperatives, or through some other mechanism?

Please explain.

The following information request is directed to THE DIVISION OF CONSUMER ADVOCACY ("Consumer Advocate") and is based on the Consumer Advocate's Preliminary Statement of Position ("SOP"):

KIUC-PSOP-IR-4 Ref: Consumer Advocate Preliminary SOP, pages 15-16.

In its Preliminary SOP, the Consumer Advocate states, in relevant part:

[T]he Consumer Advocate recommends that the CESP process should incorporate the idea that at least one scenario should represent a product that is determined solely by non-utility parties. The parties, other than the utility company, should be responsible for working together to reach consensus on the necessary inputs into a scenario and the utility company would then perform the necessary modeling work to generate the scenario.

- a. Please explain who would constitute the "non-utility parties", how they would be selected, and how these parties differ from the advisory group.
- b. Please explain what is covered by "public only factors", and specifically, what factors would be excluded.

CERTIFICATE OF SERVICE

I (we) hereby certify that the foregoing document was duly served on the following Parties and Participants, as set forth below:

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